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PACIFIC TELESIS
Group-Washington

February 8, 1993

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Donna R. Searcy
Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Dear Ms Searcy:

Re: *Verilink Corporation Petition for Rulemaking to Amend the Commission's Part 68 Rules to Authorize Regulated Carriers to Provide Certain Line Build Out Functionality as a Part of Regulated Network Equipment on Customer Premises*

On behalf of Pacific Bell and Nevada Bell, please find enclosed an original and six copies of their "*Comments*" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,

Celia Nogales

Enclosures

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List A B C D E

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:	)	
	)	
VERILINK CORPORATION	)	
	)	
Petition for Rulemaking to Amend the Commission's Part 68 Rules to Authorize Regulated Carriers to Provide Certain Line Build Out Functionality as a Part of Regulated Network Equipment on Customer Premises	)	RM _____

COMMENTS OF PACIFIC BELL AND NEVADA BELL

I. INTRODUCTION.

Pacific Bell and Nevada Bell (the "Pacific Companies") hereby provide comments on the Petition for Rulemaking to Amend the Commission's Part 68 Rules to Authorize Regulated Carriers to Provide Certain Line Build Out Functionality as Part of Regulated Network Equipment on Customer Premises ("Petition") filed by Verilink Corporation ("Verilink").

II. JOINT ENGINEERING HAS PROVEN TO BE TIME-CONSUMING AND COSTLY.

Line build-out ("LBO") attenuates strong signals emitted by CPE where the distance between regenerators or between a regenerator and the transmit/receive equipment may be short. An incorrect signal level occurs when the signal sent by the CPE is mismatched to the length of the wire between CPE equipment and the network interface unit and/or the network regenerators. By attenuating the signal, LBO prevents the

signal from being too high and causing possible damage to the network. Digital cross-talk between customer circuits may result if the power is excessive.

The Pacific Companies strongly support Verilink's Petition. The experience the Pacific Companies have had with joint engineering -- having the customer set the appropriate signal power at the carrier's direction -- is very similar to what Verilink has described in its Petition. It is time-consuming, costly and inefficient.

By the time the signal reaches the first repeater, there may be anywhere from one to twenty-five customers in the same cable bundle. If the signal level is inappropriate for any customer in the bundle, digital cross-talk may result. Thus, each time a customer is added to the bundle we may need to ask every other customer on that bundle to reset the Channel Service Unit ("CSU") to make sure the signal is balanced when it reaches the first repeater. This is very time-consuming.

It is not uncommon for customers to reset the outpulse option on their own initiative. Then we must try to identify the source of the digital cross-talk and again rebalance the cable. As Verilink notes, this problem is compounded by the fact that the outpulse signals of 0, 7.5 and 15 dB levels correspond inversely to the magnitude of the signal power, so unsophisticated customers are prone to setting a high level while intending to set a low one.

Discovering the source of digital cross-talk is often a time-consuming process. The customer causing the digital

cross-talk is usually not aware of it because the problem is not on his line. Another customer will report trouble on his line but when the technician tests the line, there will be no apparent problem unless the customer causing the problem is using his line at the same time.

This type of trouble report is known as intermittent trouble. Because the trouble may not be occurring when the technician tests the line of the complaining customer, he may need to test every line in the cable bundle to isolate the trouble. This is very time-consuming. Intermittent trouble reports are costly to resolve because of the time required. They are also a source of customer dissatisfaction because they are not quickly resolved.

Another source of difficulty is that approximately 70% of our orders for Hi-Cap service come from interexchange carriers so we are not dealing directly with the end-user who owns and operates the CSU. We must then work with the interexchange carrier to make sure the owner/user of the CSU receives the correct information. This is inefficient and time-consuming.

Finally, the implementation of minimum point of entry[1] will, in many cases, increase the length of cable/wire between the network interface and the customer's CSU. This will, in all

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[1] In the Matter of Review of Sections 68.104 and 68.213 of the Commission's Rules Concerning Connection of Simple Inside Wiring to the Telephone Network and Petition for Modification of Section 68.213 of the Commission's Rules filed by the Electronic Industries Association, CC Docket 88-57, Report and Order and Further Notice of Proposed Rulemaking, 5 FCC Rcd 4686 (1990).

likelihood, increase the possibility of a mismatch of signal strength sent vs. the signal strength required, if the customer disregards or changes the carrier's recommended LBO setting. The setting of 15 dB is the lowest setting but customers with a long wire/cable may assume the 15 dB is more appropriate than 0 dB.

III. CUSTOMERS WILL BENEFIT IF LBO IS PROVIDED IN THE NETWORK.

There is no inherent advantage to the customer in physically setting the correct outpulse option himself. He has no actual choice. It has to be set at the direction of the local exchange carrier. It is doubtful that there is any cost savings to the customer by having this functionality in the CSU. If anything, the customer is losing time and money by having to be involved in the process of ensuring that the outpulse option is set correctly.

Customers should not incur additional costs as a result of the Proposed Rule change. The Pacific Companies already have the capability to provide LBO in our network. The functionality currently available in the network interface units would allow us to provide LBO so we would not need to incur any additional costs to provide LBO. Tariffed rates would not be affected.

Allowing us to provide LBO would benefit our customers. We could make any necessary adjustments in the signal power without having to involve the customer. The customer would be relieved of any responsibility for joint

engineering. The customer would not experience any interference with his service that arises from improperly set outpulse options. As other customer services on the same cable are added and/or deleted, we could adjust the existing services LBO without contacting these customers individually. This would save time and expense and maintain network integrity and customer satisfaction.

IV. CONCLUSION.

For the foregoing reasons, the Pacific Companies urge the Commission to grant Verilink's Petition.

Respectfully submitted,

PACIFIC BELL
NEVADA BELL

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